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Attorneys for Defendant  
ROWLAND MARCUS ANDRADE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:20-CR-00249-RS

**DECLARATION OF JOHN M. PIERCE  
IN SUPPORT OF NOTICE OF  
RELATED UNITED STATES  
SUPREME COURT CASE**

Judge: Hon. Richard Seeborg

**EXHIBIT 2**

**DECLARATION OF JOHN M. PIERCE IN SUPPORT OF NOTICE OF RELATED UNITED  
STATES SUPREME COURT CASE**

I John M. Pierce declare as follows:

1. Counsel recently obtained evidence that, on June 26, 2019, the IRS Criminal Investigation Division authorized a Bank Secrecy Act (“BSA”) civil investigation into Andrade and his affiliated entity.
2. Counsel hasn’t been paid and doesn’t have the resources to further investigate these

1 matters and therefore rely on the government, specifically AUSA Christiaan  
2 Highsmith to investigate these matters AND to make the proper disclosures to the  
3 defendant and to the court.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is  
5 true and correct. Executed on January 6, 2025.  
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9 /s/ John M. Pierce  
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